

42-077-00181

RECEIVED
AUG 18 2006
Air Protection Division (3AP12)



August 16, 2006

Mr. Norm Frederick
Pennsylvania Department of Environmental Protection
Bureau of Air Quality – Title V Section
Northeast Regional Office
2 Public Square
Wilkes-Barre, PA 18711-0790

RE: Status Change of the B. Braun Allentown, PA Facility to a State-Only Synthetic Minor Permit

Current Title V Operating Permit No. 39-00055

Dear Mr. Frederick:

B Braun Medical Inc. (B. Braun) operates a surgical and medical instrument apparatus manufacturing facility in Allentown, Pennsylvania. The facility continues to operate under their Pennsylvania Department of Environmental Protection (DEP) Title V Operating Permit Number 39-00055. This permit expired on November 30, 2005; however, B. Braun submitted a Title V Permit Renewal Application at least six months before the permit expired (e.g., May 31, 2005), and is now currently operating under the Permit Shield requested in the Title V Renewal Application.

Per my correspondence with you on August 7, 2006, this letter confirms that B. Braun will no longer be considered a Title V facility due to December 19, 2005 Federal Register notice which exempts Commercial Ethylene Oxide Sterilization Facilities, that qualify as an area source, from the requirements of the Title V Operating Permit Program. Specifically, Section 63.360(f) is amended to read as follows:

“(f) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.”

Mr. Norm Frederick
Pennsylvania Department of Environmental Protection
Status Change of the B. Braun Allentown, PA Facility to a
State-Only Synthetic Minor Permit

Current Title V Operating Permit No. 39-00055

Page 2 of 2

The B. Braun facility is not required to obtain a permit under 40 CFR Part 70 for any other reason other than its status as an area source under 40 CFR Part 63, Subpart O. Accordingly, the facility will submit a State-Only Synthetic Minor Permit Application in the near future to apply for Synthetic Minor status and replace the current Title V Operating Permit.

If you have any questions, please do not hesitate to call me at (610) 933-5246 ext. 12 or David Lauer, B. Braun Environmental, Health and Safety Manager at (610) 596-2594.

Sincerely,
All4 Inc.



William V. Straub P.E.
Principal Consultant

cc: Brian Halchak – PADEP
Enforcement Programs Section (3AT13) – EPA Region 3
David Lauer – B. Braun
Steve Stancick – B. Braun